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July 22, 2014

VIA ECF

The Honorable Alvin K. Hellerstein
Senior United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Re: U.S. v. Alexis Betancourt
1:13 Cr. 00592-01 (AKH)

Dear Judge Hellerstein:


Please recall that I represent Alexis Betancourt, the defendant in the above-referenced matter. I am writing with the consent of the Government to seek an adjournment of the sentencing hearing currently scheduled for August 1, 2014. This is the first request for an adjournment of sentencing in this matter.

The Pre-Sentence Report (P.S.R.) in this matter was published at the close of business on July 11, 2014. The defense has identified a number of issues that we believe must be addressed by the United States Probation Department (Probation) in an updated, final P.S.R. I have drafted and will soon send out the defense's objection letter. I am unable to send out the objection letter until I confer with A.U.S.A. Edward B. Diskant, who is currently engaged in an extensive pre-trial hearing. Once I confer with A.U.S.A. Diskant, I am confident that we can resolve all of the issues our objection letter will raise without the need for judicial intervention.

I am requesting a sentencing date in mid-September to allow for my 10-day absence from my office during August and to permit the parties to submit our respective sentencing memoranda once Probation publishes its final P.S.R.

Thank you for considering this request.

Respectfully submitted,


Mark I. Cohen

MIC/sh

c: A.U.S.A. Edward B. Diskant
U.S.P.O. Smyla Jones
Mr. Alexis Betancourt